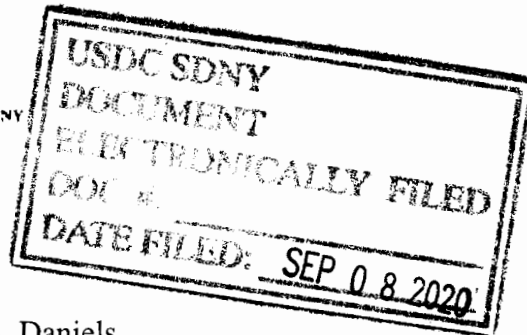


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September 4, 2020

VIA ECF

The Honorable George B. Daniels
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

SO ORDERED:

George B. Daniels
 George B. Daniels, U.S.D.J.

Dated: SEP 08 2020

Re: *United States v. Alhassan Iddris Lari*
 20-cr-143 (GBD)

Dear Judge Daniels:

Please recall that I represent Mr. Alhassan Iddris Lari in his defense of the above-referenced matter. I write to request a change in Mr. Lari's current bail conditions to permit him to travel into the District of New Jersey during his working hours. I have consulted with the Government and United States Pre-trial Services (PTS) Officer Rena Bolin, who both have no objection to this request.

Currently, Mr. Lari is at liberty on a \$50,000 personal recognizance bond (PRB) set before Magistrate Judge Kevin Nathaniel Fox on March 3, 2020. The bond is secured by three co-signers with travel restricted to the Southern and Eastern Districts of New York. He surrendered all travel documents and has not made and will not make any applications for new travel documents. Mr. Lari is also required to report to PTS and submit to mandatory drug testing which, if positive, could add a condition of drug testing/treatment to the bond. Lastly, Mr. Lari is required to continue his employment. On March 12, 2020, Your Honor modified Mr. Lari's bail to add the condition of home detention except for work daily from 4:00 p.m. to 4:00 a.m. and for religious services on Fridays from 12:00 p.m. to 2:00 p.m. Your Honor also placed Mr. Lari on location monitoring and instituted a curfew of 7:00 a.m. to 2:00 p.m.

Mr. Lari drives a yellow cab that he rents from the Long Island Queens Medallion at 21-02 44th Avenue, Long Island City, New York 11101. Presently, Mr. Lari often picks up passengers at the Port Authority Bus Terminal, but due to his bond conditions, he often finds himself in the uncomfortable position of having to turn down fares because they require travel

The Honorable George B. Daniels

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into the District of New Jersey. Additionally, Mr. Lari's bond conditions prohibit him from accepting more lucrative trips from New York to Newark Airport. If granted permission as requested, Mr. Lari's travel within the District of New Jersey would be limited to dropping off passengers from time to time.

Mr. Lari thanks Your Honor for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark I. Cohen', followed by a horizontal line.

Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Mitzi Steiner (via ECF)
A.U.S.A. Caroline Lefever (via ECF)
Mr. Alhassan Iddris Lari (via U.S. mail)